

January 15, 2025

VIA ECF ONLY

The Honorable Elizabeth A. Pascal
U.S. Magistrate Judge for the District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Copeland v. Poliquin Performance Center 2, LLC, et. al.*
Case #: 1-19-cv-20278-ESK-EAP (District of New Jersey)

Dear Judge Pascal,

Pursuant to the Court's direction, Plaintiff has taken steps to address outstanding discovery matters. Specifically:

1. Following the hearing today, Plaintiff reissued the financial interrogatories originally submitted in June 2022. These interrogatories, along with the request for tax returns for all relevant entities and individuals, were resubmitted to defense counsel.
2. Following the hearing today, Plaintiff has also reached out to defense counsel Dimitri Taresh to reschedule and resume the virtual deposition of Ms. Kandel, individually and on behalf of the Poliquin defendants. Plaintiff has indicated availability as early as the week of January 27, 2025, with the exception of January 30, due to the scheduled court conference.

These steps have been taken to comply with the Court's directives and to ensure timely progress in this matter. Should further assistance from the Court be required to facilitate the resolution of these issues, Plaintiff stands ready to provide additional context or documentation.

Thank you for your attention to this matter.

Respectfully submitted

By: /s/ Emily Declercq
Emily Declercq

Attorneys for Plaintiff

cc: B. Blackmon; E. Blackmon; D. Teresh; S. Shaffer; D. Stecklow.